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Ms. Natalie Creed
Hazardous Waste Bureau Chief
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

January 28, 2021

RE: US Ecology Idaho (USEI) Site B – IDD073114654
*January 2021 Monthly Progress Report on Recovery Actions Related to the
November 17, 2018 Explosion at the USEI Site B Facility ("Incident")*

Dear Ms. Creed:

As requested in IDEQ's letter dated December 18, 2018, USEI is hereby submitting the monthly progress report for January 2021. This report details the activities undertaken in the recovery process from December 26, 2020 through January 22, 2021. The next report will cover activities from January 25, 2021 through February 19, 2021.

USEI has performed various operations to evaluate the facility and bring it back to a state equivalent to that prior to the Incident. The actions taken during the reporting period are outlined below.

Waste Treatment, Storage and Disposal - USEI continues to receive both containers and bulk loads of waste for treatment, storage and disposal.

Inspections – Inspections have been performed and documented as required; any area that could not be inspected due to demolition activities or other safety factors was noted on the inspection form. At this time, all areas have been placed into a safe configuration.

Leachate Management – USEI has completed leachate inspections in all areas of the facility, as required by permit, and has removed accumulated leachate as required. Removed leachate has been filtered through the leachate treatment system and has been discharged to site surface impoundments for evaporation. Leachate levels for all areas continue to be in keeping with levels associated with normal operations.

Precipitation – Collected precipitation has been monitored and removed from container storage and RCRA tank areas as needed. All precipitation removed from these areas is discharged to the site surface impoundments for evaporation.

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Container Management – Twenty-six (26) containers remain in inventory that were onsite at the time of the Incident. The remaining twenty-six (26) containers are comprised of metal fines (excluding those currently held as evidence) that will need to be shipped off-site for incineration. These materials require packaging in accordance with receiving facility requirements prior to shipment. Five containers will need to be re-packaged to meet the criteria of the receiving facility, which include that the waste be shipped saturated with oil and contained in a steel drum. USEI submitted a work plan to the Department on January 9, 2020 requesting approval to perform the required treatment. USEI has completed the required steps in the OSHA settlement response and will be submitting an updated work plan to the Department. The submittal will include copies of USEI's correspondence with OSHA.

Evidence Material – Evidence from the Incident remains in secure storage at Container Storage Area 1 (CSA 1) at this time. The fencing surrounding the secured area remains intact. This includes tagged debris pieces, various split samples that have been collected, empty drums from the back of the haul truck at the Containment Building, containers of burnt magnesium (WSID # 29857-0) and floor sweeps (WSID # 29853-0), overpack drums of magnesium fines (the material involved in the explosion, WSID # 29856-0), and drums of material retrieved from the bottom of MBT 1 prior to decontamination of the Containment Building. All remaining containers of magnesium material from Reade Manufacturing Company, the company whose waste stream was being treated when the explosion occurred, remain on site at this time.

On January 29, 2019, USEI received a Preservation Request Letter from Ex. 6 PP / Ex. 7(C) Special Agent, US EPA-CID. As the analyses of the Incident by outside agencies remain ongoing, the timeframe for storage of these materials is unknown at this time.

Baker Risk received analytics for all samples collected, and determined the cause of the Incident. The final investigation report was completed July 22, 2019, and a full copy of the report was provided to DEQ on July 31, 2019. USEI has requested that this information remain confidential until external investigations being conducted by various agencies are complete.

Cleanup Material – USEI has continued monitoring the area outside the fence for additional foam material generated during the de-construction of the Containment Building. No additional material was identified during the last inspection of the fence. USEI personnel will continue monitoring the fence line on a monthly basis to ensure material is not exiting the facility.

Facility Structures – The contract for construction of the new Indoor Stabilization Building and Container Storage Pad 8 has been awarded to Record Steel and Construction, Inc. Pre-construction activities began on June 17, 2020, and construction began on June 24, 2020. Portions of the chain link fencing were removed from the east side of the

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Containment Building to facilitate demolition activities. New fencing has been placed around the building to facilitate construction activities. Construction is approximately 90% complete at this time.

Permanent wiring to the new pump house will not be completed until construction of the Indoor Stabilization Building is completed. Temporary wiring will be in place in the building until that time. Approximately twenty feet of fencing was removed from the north side of the pump house area to accommodate staging a pump as well as construction activities in that location.

The former guardhouse was moved to the active yard area to serve as an office for operations. The trailer has not been put into service as an operations office at this time.

Facility Personnel – Since the last report, no employees have left employment with USEI. No employees have been hired.

If you have any questions regarding the content of this letter or require additional information, please call me or Rebecca Hogaboam at (208) 834-2275.

Regards,

Noel Bailey

Noel Bailey
Technical Manager

cc: Margaret Olson, EPA Region 10 (Electronic Copy Only)
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